REMARKS/ARGUMENTS

After the foregoing Amendment, Claims 1-11, 16 and 17 are currently pending in this application. Claims 12-15 are canceled without prejudice. Claims 1, 11, and 16 are currently amended. The Applicants submit that no new matter has been introduced into the application by these amendments.

Claim Rejections - 35 USC §112

Claim 1 stands rejected under 35 U.S.C. 112 as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claim 1 has been amended to overcome this rejection.

Claim Rejections - 35 USC §102

Claims 16-17 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 7,072,663 to Ramos et al (hereinafter "Ramos"). The Examiner stated that Ramos discloses selecting a PSA based on which PSAs the WTRU is permitted to access as recited in claim 16 of the present application. (See November 28, 2007 Office Action at page 3). The Applicant respectfully disagrees, on at least two grounds: Claim 36 of Ramos does not disclose the element of *selecting a PSA*,

and Ramos does not disclose the element of *which PSAs the WTRU is permitted to access.*

In claim 36, Ramos discloses a method for use in a network, where a user is assigned to an area and has a list of candidate areas. According to claim 36, the prioritization is performed by dividing the assigned area into smaller areas and using information relating to each of the smaller areas, and estimating a parameter for each candidate area, assuming that the user is assigned to the candidate area and taking into account the information relating to the smaller areas. This is not selecting a PSA based upon which PSAs the WTRU is permitted to access. *Prioritizing* a plurality of areas is disclosed by Ramos in claim 36, but *selecting* a single cell is not. Further, claim 36 does not disclose *which PSAs the WTRU is permitted to access*. The basis for the prioritization according to claim 36 of Ramos is estimation of a parameter for each candidate area. That prioritization, as disclosed by Ramos, does not include analysis of which PSAs the WTRU is permitted to access. (See Ramos at column 7, line 64 – column 8, line 20.)

Nowhere, including in claim 36, does Ramos disclose selecting a PSA based on which PSAs the WTRU is permitted to access as recited in claim 16 of the present application. For at least these reasons, claim 16 is not anticipated by Ramos.

Claim 17 is dependent upon independent claim 16, which the Applicants believe is allowable over the cited art of record for the same reasons provided above.

Based on the arguments presented above, withdrawal of the §102 rejection of claims 16 – 17 is respectfully requested.

Claim Rejections - 35 USC §103

Claims 1-2 and 5-11 stand rejected under 35 U.S.C. § 103 as being unpatentable over Ramos in view of U.S. Patent Publication No. 2003/0134636 to Sundar et al. (hereinafter "Sundar"). The Applicants respectfully disagree, for the following reasons: Ramos does not disclose establishing a radio link and a bidirectional IP link at said WTRU, wherein the radio link and the IP link connect to a same network; Ramos does not disclose transmitting a request for system information from a WTRU over a bidirectional IP link; and no teaching, suggestion, or motivation exists to combine Ramos and Sundar.

The Examiner stated that Ramos discloses establishing a bidirectional IP link at a WTRU. (See November 28, 2007 Office Action at page 4, citing Ramos at column 3, lines 7-8 and column 8, lines 26-31.) The Applicants submit that Ramos does not disclose establishing a radio link and a bidirectional internet protocol (IP) link at said WTRU, wherein the radio link and the IP link connect to a same network, as recited in amended claim 1 of the present application.

Ramos discloses that a mobile station may use more than one radio access technology, (see Ramos at column 3, lines 7-8), and may be able to communicate with different types of networks. (See Ramos at column 3, lines 27 – 28.) Ramos further discloses that a CCRM (Common Radio Resource Management) is arranged to be connected to different systems, including WCDMA, GSM/EDGE, TDD, and IP RAN (Internet Protocol Radio Access) systems. (See Ramos at column 3, lines 53 – 55.) However, nowhere does Ramos disclose a radio link and an IP link which connect to a same network. According to Ramos, multiple links to a particular network would be of a particular type. And if multiple links of different types were established at a mobile station, those links would connect to different networks. (See Ramos at Figure 2 and Figure 4.) For at least this reason, the Applicant believes that amended claim 1 is not obvious over Ramos in view of Sundar.

The Examiner stated that that Ramos discloses transmitting a request for system information from a WTRU over a bidirectional IP link as recited in claim 1 of the present application. (See November 28, 2007 Office Action at page 4.) The Applicants respectfully disagree.

The Examiner stated that Ramos discloses transmitting a request for system information from a WTRU over a bidirectional IP link with the following language: "In step 1, a handoff trigger is detected." (See November 28, 2007 Office Action at page 4, citing Ramos at column 7, lines 35.) Ramos does not define the detection of a

handoff trigger, but does provide that the handoff trigger "may be any of the conventional triggers in the known communications system." (See Ramos at column 7, lines 35-36.) This is not a transmission of a request for system information from a WTRU over a bidirectional IP link. Detection of a handoff trigger as disclosed by Ramos does not indicate a *transmission of a request*. Also, detection of a handoff trigger as disclosed by Ramos does not indicate a transmission of a request *for system information*. For at least these reasons, it is inaccurate to say that Ramos discloses transmitting a request for system information from a WTRU over a bidirectional IP link as recited in claim 1 of the present application.

The Examiner stated that Ramos discloses transmitting a request for system information from a WTRU over a bidirectional IP link with the following language: "The CRRM [Common Radio Resource Management] will receive periodically or on demand information about the status of cell resources." (See November 28, 2007 Office Action at page 4, citing Ramos at column 5 lines 12-13.) Again, this is not a transmission of a request for system information from a WTRU over a bidirectional IP link. The information transmitted to the CRRM relates to the *status* of cell resources or the status of other elements of the Radio Access Network (RAN). None of this information constitutes a *request*. (See Ramos at column 5, line 12 – column 7, line 32.) Second, the transmissions to the CRRM are from elements of the RAN, not *from a WTRU*. (See Ramos at column 5 line 12 – column 7 line 32 and Figure 4.)

As is shown here, Ramos does not disclose the transmission of a request for system information from a WTRU over a bidirectional IP link. For at least these reasons, the Applicants believe that claim 1 is not obvious over Ramos in view of Sundar.

The Examiner stated that it would have been obvious to a person of ordinary skill in the art to combine teachings of Ramos and Sundar. (See November 28, 2007 Office Action at page 5, quoting Sundar at paragraph [0017].) The Applicants disagree, on the basis that no teaching, suggestion, or motivation to combine Ramos and Sundar exists.

The Examiner stated that it would have been obvious to combine Ramos and Sundar because "at the completion of the association process, the client is ready for receiving or transmitting data." (See November 28, 2007 Office Action at page 5, citing Sundar at paragraph [0017].) Sundar discloses that a client sends a probe for synchronization information an access point, and that a response is sent back to the client. (See Sundar at paragraph [0017.) Ramos discloses that a mobile station may communicate with an IP RAN network. (See Ramos at column 3, lines 27- 57.) However, the fact that an association process renders a client ready to transmit data does not suggest that system information should be received over a bidirectional IP link. Even if the teachings of Ramos and Sundar can be combined, the fact that references can be combined does not alone render a combination obvious. (See MPEP 2143.01 III).

The motivation as offered by the Examiner is insufficient to support a finding that claim 1 is obvious in light of Ramos and Sandar. For at least this reason, the Applicants believe that claim 1 is allowable over Ramos in view of Sandar.

Claims 2 and 5-11 are dependent upon independent claim 1, which the Applicants believe are allowable over the cited art of record for the same reasons provided above.

Claims 3 and 4 stand rejected under 35 U.S.C. § 103 as being unpatentable over Ramos in view of Sundar and further in view of U.S. Patent No. 7,055,107 to Rappaport et al. Claims 3 and 4 are dependent upon independent claim 1, and the Applicants believe that claims 3 and 4 are allowable over the cited art of record for the same reasons provided above.

Based on the arguments presented above, withdrawal of the § 103 rejection of claim 1-11 is respectfully requested.

Conclusion

If the Examiner believes that any additional minor formal matters need to be addressed in order to place this application in condition for allowance, or that a telephone interview will help to materially advance the prosecution of this application, the Examiner is invited to contact the undersigned by telephone at the Examiner's convenience.

In view of the foregoing amendment and remarks, Applicants respectfully submit that the present application, including claims 1-11 and 16-17, is in condition for allowance and a notice to that effect is respectfully requested.

Respectfully submitted,

Menon et al.

By _____
Wesley T. McMichael
Registration No. 56,982

Volpe and Koenig, P.C.
United Plaza, Suite 1600
30 South 17th Street
Philadelphia, PA 19103
Telephone: (215) 568-6400
Facsimile: (215) 568-6499

WTM/JEM/ls